
Notice Number: NOT-OD-20-086

Key Dates

Release Date: March 12, 2020

Related Announcements

NOT-OD-20-082
NOT-OD-20-083

Issued by
Office of The Director, National Institutes of Health (OD)

Purpose

The NIH is deeply concerned for the health and safety of people involved in NIH research, and about the effects on the biomedical enterprise in the areas affected by the HHS declared public health emergency for COVID-19. Due to the potential exceptional impact of the declared public health emergency, we want to assure our recipient community that NIH will be doing our part to help you continue your research. Our website on Extramural Response to Natural Disasters and Other Emergencies has a list of available resources.

The purpose of this Notice is to alert the community of administrative flexibilities that will apply to NIH applicants and recipients. Therefore, working with the Office of Management and Budget (OMB) and the Department of Health and Human Services (HHS) NIH has identified the following short-term administrative flexibilities to assist our applicants with managing administrative, financial management and audit requirements under the Uniform Guidance “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” – which are implemented in HHS regulation at 45 CFR Part 75 – without compromising their accountability requirements.

These flexibilities are applicable to NIH applicants and recipients where the entity is conducting research activities related to or affected by COVID-19. Affected entities are those that have been closed, or business activities have been hindered due to COVID-19 precautionary measures and/or illnesses. Entities that are affected will be asked to provide documentation to NIH describing the effects, and how long their facility and NIH related research, clinical practices, or instruction was and/or will be affected.

The following requirements detail flexibilities that NIH is offering during this Public Health Emergency:

Pre-Award Costs

NIH is allowing pre-award costs to be incurred from January 20, 2020 through the public health emergency period and prior to the date of a federal award for all applicants and recipients that have been affected by COVID-19.

Extension of Post-Award Financial and Other Reporting

If your institution is unable to complete and submit financial and Research Progress Performance Reports (RPPR) by the scheduled due date, due to the effects of COVID-19, please be sure to contact the assigned grants management and/or program official to let them know the reports will be late.

NIH will accept these late reports but will delay issuing grant awards until the reports are received and accepted by the appropriate Institute or Center (IC).

Prior Approval Requirement Waivers

As a reminder, recipients have rebudgeting authority available under NIH Grants Policy Statement Sec. 8.1.1.2, which states, “NIH prior approval is not required to rebudget funds for any direct cost item that the applicable cost principles identify as requiring the Federal awarding agency’s prior approval, unless the incurrence of costs is associated with or is considered to be a change in scope.”

Recipients that are not under Streamlined Non-competing Application Process (SNAP) have the discretion to carry forward unobligated balances on their active grants for immediate efforts to support activities related to or affected by COVID-19 as long as the charges are allowable costs and are within the scope of the original award.

In addition, affected recipients that have active non-SNAP grant projects may extend the final budget period of the approved project period on active grants one time for a period of up to 12 months without requesting prior approval, by notifying the assigned grants management specialist.

Cost Related Flexibilities/Expenditure of Award Funds

Salaries:

NIH understands that many researchers may be unable to work as a result of or related to the effects of COVID-19. If a recipient organization's policy allows for the charging of salaries and benefits during periods when no work is performed due to the effect of COVID-19, regardless of the funding source, including Federal and non-Federal, then such charges to NIH grant awards will be allowable.

Reminder: NIH awarding Institutes/Centers (ICs) may request documentation to confirm the requirements of institutional policies.

Stipends:

Institutions affected by COVID-19 may continue to provide stipend payments to fellows and trainees who may be unable to work as a result of or related to COVID-19. Recipients should notify the assigned grants management official, and provide documentation demonstrating the effect of COVID-19, and how long the institution will be affected.

Travel:

Non-refundable costs associated with grant-related travel that has been cancelled due to COVID-19 may be charged to the NIH award if they would have otherwise been allowable. See NIH GPS 7.9.1 for detailed information on the allowability of travel expenses.

Conference Registration Fees:

Non-refundable registration fees for conferences, symposiums or seminars that have been cancelled due to COVID19 may be charged to the NIH award if they would have otherwise been allowable (e.g. necessary to accomplish program objectives).

NIH-Supported Meetings and Conferences:

Scientific meetings, conferences and workshops supported by NIH funding may be delayed or cancelled due to COVID-19. Non-refundable costs associated with NIH supported meetings and conferences affected by COVID-19 are allowable and may be requested as an administrative supplement to the appropriate funding IC. Recipients should contact their assigned grants management specialist and program official to provide documentation demonstrating the effect of COVID-19. The funding institute or center will work with the recipient to address the impact on the NIH grant.

As this Public Health Emergency continues, recipients may identify additional cost-related flexibilities that are needed. NIH will consider such requests on a case-by-case basis. Contact your assigned grants management specialist and program official to provide a detailed justification outlining the effect of COVID-19 and the flexibility required. NIH will

consider such requests in line with the Federal cost principles, NIH policy, and need to support the project.

Extension of Closeout

- NIH will allow recipients that are affected by COVID-19 to delay submission of any final financial, performance, and other reports required by the terms and conditions of award for the closeout of expired projects, provided that proper notice about the reporting delay is given by the recipient to the agency. This delay may not exceed one year.

Extension of Single Audit Submission

- Per 45 CFR 75.501, institutions expending $750,000 or more in Federal funding in a Fiscal Year (FY) are required to submit an annual Single Audit report.
- NIH will allow recipients directly affected by COVID-19 to delay the completion and submission of the Single Audit report for up to 12 months beyond the normal due date.
- The delayed completion and submission would still qualify the recipient as a “low-risk auditee” under the criteria of 45 CFR 75.520.

Additional Resources:

NIH issued a separate Notice related to Late Application flexibilities.

Please see the COVID-19 Flexibilities for Applicants and Recipients FAQs for additional guidance.

NIH is continuing to monitor the situation, identifying ways we can help as outlined on this page, and will publish any additional information pertaining to these emergency declarations in the NIH Guide.

Inquiries

Please direct all inquiries to:

Division of Grants Policy
Office of Policy for Extramural Research Administration
Office of Extramural Research
Telephone: 301-435-0949
GrantsPolicy@nih.gov

Weekly TOC for this Announcement
NIH Funding Opportunities and Notices